

**APPENDIX G**  
**I-405 Corridor Program**  
**Environmental Justice Analysis**

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## APPENDIX G: I-405 CORRIDOR PROGRAM EIS ENVIRONMENTAL JUSTICE ANALYSIS

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### Introduction

Executive Order (EO) 12898, issued by President Clinton in 1994, requires that “each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations...” In his memo transmitting the Executive Order to federal agencies, President Clinton further specified that, “Each Federal agency shall analyze the environmental effects, including human health, economic and social effects, of Federal actions, including effects on minority communities and low-income communities, when such analysis is required by the National Environmental Policy Act of 1969 (NEPA).”

Guidance on how to implement EO 12898 and conduct an environmental justice analysis has been issued by the President’s Council on Environmental Quality (CEQ, 1997) and several federal agencies, including the U.S. Department of Transportation (DOT Order 5610.2) and the Federal Highway Administration (FHWA Order 6640.23). These orders establish that it is Federal policy to avoid to the extent practicable disproportionately high and adverse human health or environmental impacts on the minority or low-income population.

### Methodology and Approach

The I-405 Corridor Program alternatives were evaluated for compliance with EO 12898 and FHWA Order 6640.23. For this type of analysis, three fundamental evaluation measures are used. First, a determination is made as to whether a minority or low-income population exists in the impact zones. Secondly, a determination is made as to which impacts of the alternatives are high and adverse. The third measure is one of magnitude of distribution or intensity to determine if high and adverse impacts fall disproportionately on the minority or low-income population.

The environmental justice analysis examined both minority and low-income populations in the I-405 Corridor Program study area. For information on the distribution of minority and low-income populations, 1990 census data were used (U.S. Census Bureau 1992). Race and income data were reviewed at the finest level available from the census, i.e., Census Block for race and Census Block Group for income. Based on 1990 census data, the minority population as a percentage of the overall study area was determined to be 10 percent, and the low-income population as a percentage of the overall study area was determined to be 4 percent. Figure G-1 shows the location of minority populations in the study area at the Census Block level. The distribution of low-income populations was not able to be mapped because their numbers were too few to be apparent at the Census Block Group level.

The expertise reports prepared for the I-405 Corridor Program Environmental Impact Statement (EIS) were reviewed to determine which environmental or human health impacts could reach the level of high and adverse impacts after proposed mitigation measures were implemented. In addition, any environmental or human health impacts that were of concern to the minority and low-income populations would have been considered for further analysis.

Since there is no specific guidance in EO 12898 or FHWA Order 6640.23, the test of disproportionality is made on the basis described in the U.S. Environmental Protection Agency's (USEPA) Draft Revised Guidance for Investigating Title VI Administrative Complaints Challenging Permits (Draft Revised Investigation Guidance) (USEPA, June 2000). This guidance suggests two to three standard deviations above the mean as a quantitative measure of disparate effect.

While each element of this approach was conducted, no detailed analysis was required to make a final determination. This is because of the following:

1. None of the environmental or human health impacts identified in the expertise reports prepared for the I-405 Corridor Program Environmental Impact Statement would reach the level of high and adverse after proposed mitigation measures were implemented.
2. There was no indication, based on the outreach and public involvement program to date, that there were issues of concern to the minority or low-income populations that would warrant further study.

### **Coordination with Agencies and Jurisdictions**

Findings on issues of potential concern to the minority and low-income populations were based on public outreach (see "Outreach to Target Populations" below) and discussions with planners in Bellevue, Renton, Kirkland, and Snohomish County, as well as health department planners from south, east, and Northshore King County that were conducted by Carol Hunter of WSDOT. Ms. Hunter identified several initial locations of potential environmental justice sensitivity (listed from south to north):

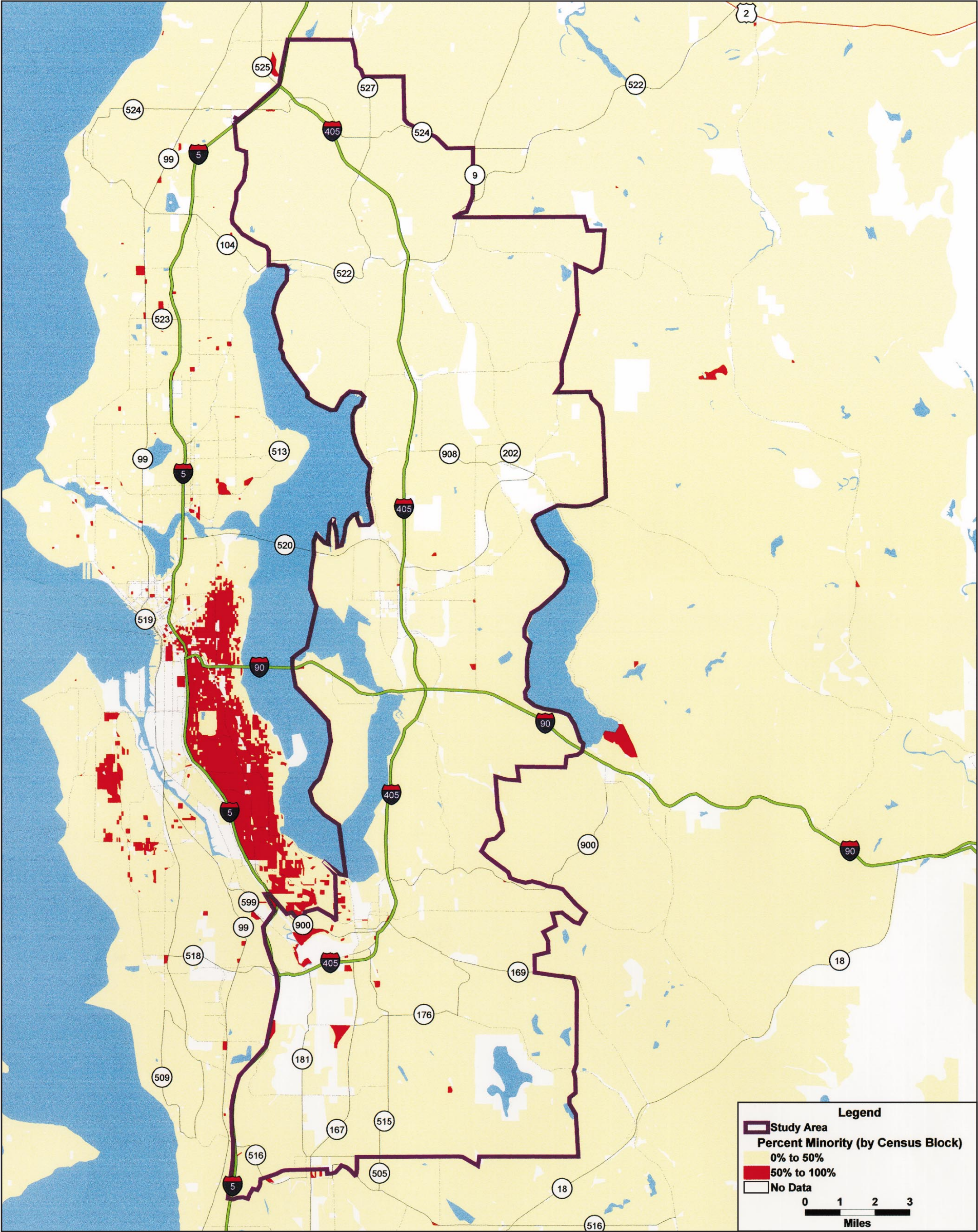
#### **I-405 Expansion:**

- Northeast quadrant of I-405/I-5 interchange area in Tukwila
- A large area in Renton south of Boeing
- Southeast quadrant of the I-90/I-405 interchange in Bellevue
- Between NE 8th Street and Lake Hills Connector in Bellevue
- Totem Lake area in Kirkland, NE 116th to NE 132nd Street
- Northwest quadrant of the I-405/SR 522 interchange in the Bothell area
- West of the I-405/I-5 interchange in Lynnwood

#### **Arterial Expansion:**

- A large area in Renton south of Boeing
- I-90 to SR 520 and 120th to 174th / Crossroads area in Bellevue
- Between Bel-Red Road and West Lake Sammamish Parkway in Redmond/Bellevue





Distribution of the Minority  
Population Within the Study Area  
Figure No. G-1



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From these contacts, a number of issues were initially identified as having the potential to affect the minority or low-income populations. These issues are discussed below, along with identification of specific components of the I-405 Corridor Program Preferred Alternative that could address these issues.

The transportation issues that emerged are largely related to transit. There is concern about the limited bus service (infrequent during the peak and even less so during non-peak hours) to industrial areas where many minorities are employed. There is little transit service to the industrial areas in the first place, and many industrial and hotel jobs have shifts beginning and ending when there is no transit service available at all. Vanpooling to industrial/hotel areas appears to be an attractive option according to those interviewed. Other areas/services that are difficult to access are health care and social services that are often located in “lower rent suburban areas” with little transit or only peak period service. For low-income working people, getting to health care facilities is problematic during traditional office hours. They often need evening appointments when transit is unavailable or very limited. Transit access to the University of Washington and language barriers limiting better access to current transit service were also mentioned as issues. The predominant non-English languages spoken in the general area include Spanish, Vietnamese, Mandarin, Ukrainian/Russian, and Korean.

Improving existing transit systems and connections in the study area is a key component of the I-405 Corridor Program. The Preferred Alternative would increase transit service in the study area by up to 75 percent based on demand, and would create 1,700 new vanpools—a 100 percent increase. In addition, the Preferred Alternative recommends more detailed examination of high-capacity transit options across Lake Washington and within the central Eastside area (Bellevue, Kirkland, and Redmond).

Maintaining and enhancing the pedestrian environment is of considerable concern. Many low-income people have limited access to private vehicles, so preserving the ability to walk to shopping, services, and transit is an important mobility issue. The impacts on the pedestrian environment are of particular concern in the arterial widening components of the alternatives.

Pedestrian and nonmotorized improvements are included throughout the study area under the I-405 Corridor Program Preferred Alternative. This alternative would connect existing neighborhoods by building eight new pedestrian/bicycle crossings over I-405. In addition, the Preferred Alternative would construct ten missing connections between existing trails, further enhancing pedestrian and nonmotorized access.

Widening of I-405 did not surface as a particularly important factor impacting low-income or minority groups. With the exception of the Renton area, there are very few pockets of low-income or minority communities directly adjacent to I-405. Tolls on I-405, however, could be a burden on the low-income population – but as one interviewee pointed out, the impact of the additional expense could be shared by carpooling.

Tolls or other pricing strategies are not proposed for implementation as part of the I-405 Corridor Program Preferred Alternative.

## **Outreach to the Target Populations**

Public involvement is a key element in achieving environmental justice. FHWA Order 6640.23 Part 5(c) states that “FHWA will administer its governing statutes so as to identify and avoid

discrimination and disproportionately high and adverse effects on minority populations and low-income populations by: (Subpart 4) providing public involvement opportunities and considering the results thereof, including providing meaningful access to public information concerning the human health or environmental impacts and soliciting input from affected minority and low-income populations in considering alternatives during the planning and development of alternatives and decisions.”

Public input to the I-405 Corridor Program has been an essential element of the environmental analysis, documentation, and review process. The public involvement program is ongoing and seeks to establish informed public consent for a strategy to improve mobility in the I-405 corridor. Nonetheless, the I-405 corridor provides a unique challenge for implementing a public involvement program. The project area is over 30 miles long and contains over 500,000 people. In addition, research has revealed that the corridor’s special populations are served by few organized community organizations or media outlets, and instead are loosely affiliated.

In response a multi-media approach to public involvement was implemented that incorporates both broad-based and highly targeted communication tools and strategies. Included among these are a large (40-member) community advisory committee (I-405 Corridor Program Citizens Committee) representing a wide range of interests and backgrounds from throughout the corridor, an extensive media outreach program for widespread distribution of project information, public meetings conducted throughout the corridor, project newsletters, electronic newsletters, a comprehensive project web site containing key project documents, and a large-scale speakers bureau to make presentations to the large number of community organizations in the corridor.

In order to target public involvement efforts to minority and low-income populations, research was conducted to identify organizations that represent these groups so that project briefings and meeting could be set up to provide information and receive public comment. Through these efforts it was learned that very few formal organizations represent these groups in the I-405 corridor and the best way to provide information was through service providers to these populations. Contacts with public outreach staff from jurisdictions in the corridor confirmed this assessment. From this research, a unique special populations outreach approach was then developed that focused on service providers in the corridor that offer minorities, refugees, immigrants, and economically disadvantaged persons services such as English as a Second Language (ESL) classes, citizenship classes, counseling, food, and housing assistance.

Contact was made with a wide range of service providers (approximately 20) to identify interests and preferences for presentations and distributing information to their clients. Most preferred written materials and offered to display or distribute information to their clients. There was little interest in receiving presentations due to their limited time availability. A few expressed an interest in having a presentation and these have been or will be arranged.

The focus for the written materials was the issuance of the Draft EIS and the opportunities to participate in the public hearings, interact through the web site, send in comments, or attend committee meetings and offer comments. A special project fact sheet was developed and translated into Chinese, Russian, and Spanish for distribution through the service providers. The fact sheet highlighted opportunities to participate and where to obtain project information, including copies of the EIS. These translated fact sheets were distributed through the service organizations as well as in local libraries and city halls.



The I-405 Corridor Program's public involvement process has been inclusive of all members of the public. All meetings for the project conformed to Americans with Disabilities Act (ADA) requirements, and materials have been provided in formats accessible by everyone. All public meetings and hearings have been accessible by public transit. The DEIS was distributed to all the public libraries in the corridor, most of which are served by transit. The FEIS will be distributed similarly.

## **Conclusion**

After the proposed mitigation is implemented, none of the environmental or human health impacts identified in the expertise reports prepared for the I-405 Corridor Program EIS would reach the level of a high and adverse effect in the context of EO 12898 or FHWA Order 6640.23. As there are no high and adverse impacts as a result of this program, this analysis therefore concludes that no high and adverse human health or environmental effects are expected to fall disproportionately on minority or low-income populations. The program is therefore consistent with the policy established in EO 12898 and FHWA Order 6640.23.

## References

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